

Comment regarding Proceeding 00-67, “In the matter of compatibility between cable systems and consumer electronics equipment.”

I’ve read the “astroturf” purportedly written by the Connecticut League of Conservation Voters. They neglect to account for the standby power that cable boxes draw 24x7. Assuming the boxes deployed all meet **2013** EnergyStar standards of 29 kilowatt hours per year and the US Department of Labor’s estimate of \$0.195/kilowatt hour in that area – that’s \$5.65 per TV per year the consumer must start paying, not including the high lease fees associated with cable boxes. (If the current generation of boxes is deployed, multiply that annual electricity cost per TV by three!) Cablevision’s cost savings will come out of users’ pockets in the form of increased utility bills. Is this idea really that “green” after all? Encryption of basic channels may well reduce Cablevision’s cost – and who better to know since they quite likely wrote the text that was submitted. It’s questionable whether they would pass those costs along to consumers: the only direction cable bills go is “up.”

As for the specious argument that cablecards are some magical panacea that consumers can use to render the device of their choice compatible with these proposed 100% encrypted services – if only it were that easy. There are precious few devices that can host a cablecard as well as communicate with a switched digital video tuning adapter. In any case, consumers are requested to switch from a simple attachment of a coaxial cable into the back of their set to (in most cases) a far more complex setup. I’m hard-pressed to identify any cablecard solution that would cost a consumer less than \$300 in the first year of ownership. Furthermore, cable companies do the absolute bare minimum required to support the devices. If you phone for help with your cablecard, you are likely to receive one or more visits (“truck rolls” – which we’re trying to reduce, right?) while every level of the cable operator’s ill-trained staff bumbles through getting your service call resolved. Oh, and the power consumption of just *one* of my Cisco tuning adapters is 268 kilowatt hours per year – at the same \$0.195/kWh pricing noted above, that’s \$52.26 in utility costs.

The cable industry’s motives for encryption are entirely self-serving. There is no benefit to the consumer, none whatsoever. Nor is there any benefit to the environment.